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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-mj-00008-CWH
)	
)	
Plaintiff,)	
)	
vs.)	
)	
ERNESTO JOSHUA RAMOS,)	
)	
Defendant.)	
)	

STIPULATION TO CONTINUE PRELIMINARY HEARING

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nicholas D. Dickinson Assistant United States Attorney, counsel for the United States of America, and Peter S. Christiansen, counsel for Defendant RAMOS, that the preliminary hearing for the above-captioned matter, currently scheduled for February 23, 2015, at the hour of 4:00 p.m., be vacated and continued to a date and time convenient for this Court, but in no event earlier than twenty-one (21) days.

This stipulation is entered for the following reasons:

1. Defendant Ramos recently retained current counsel. The parties believe that this matter may be resolved. The parties need additional time to review discovery and discuss plea negotiations.

2. The Defendant is not in custody and does not object to the continuance.

1 3. Denial of this request for continuance of the preliminary hearing would prejudice
2 both the Defendant and the Government and unnecessarily consume this Court's valuable
3 resources, taking into account the exercise of due diligence.

4 4. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 5. The additional time requested by this stipulation, is excludable in computing the
7 time within which the defendant must be indicted and the trial herein must commence pursuant
8 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(8)(A), considering the factors under
9 18 U.S.C. § 3161(h)(8)(B)(i) and (iv).

10 6. This is the first request for a continuance of the preliminary hearing herein.

11 DATED: January 20, 2014.

12
13 /s/
14 _____
NICHOLAS D. DICKINSON
Assistant United States Attorneys
Counsel for the United States

15 /s/
16 _____
PETER S. CHRISTIANSEN
Counsel for Defendant RAMOS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-mj-00008-CWH
)	
)	ORDER CONTINUING
Plaintiff,)	PRELIMINARY HEARING
)	
vs.)	
)	
ERNESTO JOSHUA RAMOS,)	
)	
Defendant.)	
_____)	

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS HEREBY ORDERED**, that the preliminary hearing in the above-captioned matter, currently scheduled for January 23, 2015, at the hour of 4:00 p.m., be vacated and continued to February 19, 2015 at 4:00 p.m.



UNITED STATES MAGISTRATE JUDGE